

January 25, 2018

Via SCPSC E-FILING DMS

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

**Re: Annual Review of Base Rates for Fuel Costs of South Carolina Electric & Gas Company;
Docket No. 2018-2-E**

Dear Ms. Boyd:

Please find attached for electronic filing with the South Carolina Public Service Commission ("Commission") a copy of the Petition to Intervene on behalf of Wal-Mart Stores East, LP, and Sam's East, Inc. (together, "Walmart"), in the above-referenced case. By copy of this letter, I am serving all parties of record via Electronic Mail and First-Class Mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By



Stephanie U. Eaton
(SC Bar No. 80073)

Derrick Price Williamson
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com

Counsel to Wal-Mart Stores East, LP and Sam's East, Inc.

SUE/sds
Attachments
c: Certificate of Service

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2018-2-E

IN RE: Annual Review of Base Rates for)	PETITION TO INTERVENE OF
Fuel Costs of South Carolina Electric & Gas)	WAL-MART STORES EAST, LP
Company)	AND SAM'S EAST, INC.

Pursuant to Rule 103-825 and other applicable rules and regulations of the South Carolina Public Service Commission ("Commission"), Wal-Mart Stores East, LP and Sam's East, Inc. (collectively, "Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. Pursuant to S.C. Code Ann. §§ 58-27-865 (Supp. 2017), on October 4, 2017, the Commission established this proceeding for the annual review of the base rates for fuel costs of South Carolina Electric & Gas Company ("SCE&G") and to determine if any adjustment in the fuel cost recovery mechanism is necessary and reasonable, including costs associated with SCE&G's previously approved distributed energy resource program.

2. Walmart is a global retailer of goods and services and also operates throughout the United States. Walmart's principal energy management office is located at 2001 SE 10th Street, Bentonville, AR 72716-0550.

3. Walmart is a large commercial customer of SCE&G. Walmart has approximately 35 facilities in South Carolina that are served by SCE&G, which include Walmart Supercenters, Sam's Clubs, and gas stations. Walmart purchases more than 140 million kWh annually from SCE&G. Electricity is one of the largest operating costs faced by Walmart. As a result, any modification to SCE&G's electric rates and terms of service has the potential to substantially

impact Walmart's operations in South Carolina. As such, Walmart has a direct and substantial interest in the outcome of this proceeding. In addition, as a large commercial customer that purchases substantial amounts of electric and related services from SCE&G pursuant to multiple accounts at multiple locations, Walmart has an interest in this proceeding that is not represented by any other party.

4. The attorneys representing Walmart in this proceeding are:

Stephanie U. Eaton
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC
Phone: (336) 631-1062
Fax: (336) 725-4476
E-mail: seaton@spilmanlaw.com

Derrick Price Williamson
Spilman Thomas & Battle, PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050
Phone: (717) 795-2740
Fax: (717) 795-2743
E-mail: dwilliamson@spilmanlaw.com

Lara R. Brandfass
Spilman Thomas & Battle, PLLC
300 Kanawha Boulevard, East
Charleston, WV 23501
Phone: (304) 340-3780
Fax: (304) 340-3801
E-mail: lbrandfass@spilmanlaw.com

Ms. Eaton is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Mr. Williamson and Ms. Brandfass be added jointly to the service list as Walmart may seek Mr. Williamson's and Ms. Brandfass' admissions to appear before the Commission *pro hac vice* in the near future.

5. This Petition to Intervene is timely filed, as this Petition meets the Commission's established deadline for intervention of January 25, 2018.

WHEREFORE, Wal-Mart Stores East, LP and Sam's East, Inc., respectfully request that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By 

Stephanie U. Eaton (SC Bar No. 80073)
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
Phone: (336) 631-1062
Fax: (336) 725-4476
E-mail: seaton@spilmanlaw.com

Derrick Price Williamson
Spilman Thomas & Battle, PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050
Phone: (717) 795-2740
Fax: (717) 795-2743
E-mail: dwilliamson@spilmanlaw.com

Lara R. Brandfass
Spilman Thomas & Battle, PLLC
300 Kanawha Boulevard, East
Charleston, WV 23501
Phone: (304) 340-3780
Fax: (304) 340-3801
E-mail: lbrandfass@spilmanlaw.com

Counsel to Wal-Mart Stores East, LP and Sam's East, Inc.

Dated: January 25, 2018

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2018-2-E

IN RE: Annual Review of Base Rates for)	CERTIFICATE OF SERVICE
Fuel Costs of South Carolina Electric & Gas)	
Company)	

I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail and First-Class Mail:

K. Chad Burgess, Esq.
Matthew W. Gissendanner, Esq.
South Carolina Electric & Gas Company
Mail Code C222
220 Operation Way
Cayce, SC 29033
chad.burgess@scana.com
matthew.gissendanner@scana.com

Benjamin P. Mustian, Esq.
Willoughby & Hoefer, P.A.
P.O. Box 8416
Columbia, SC 29202
bmustian@willoughbyhoefer.com

Richard L. Whitt, Esq.
Timothy E. Rogers, Esq.
Austin & Rogers, P.A.
508 Hampton Street, Suite 300
Columbia, SC 29201
RLWhitt@austinrogerspa.com

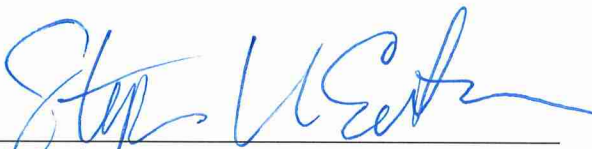
Scott Elliott, Esq.
Elliott & Elliott, P.A.
1508 Lady Street
Columbia, SC 29201
selliott@elliottlaw.com

Andrew M. Bateman, Esq.
Jenny R. Pittman, Esq.
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
abateman@regstaff.sc.gov
jpittman@regstaff.sc.gov

Alexander G. Shissias, Esq.
The Shissias Law Firm, LLC
1727 Hampton Street
Columbia, SC 29201
alex@shissiaslawfirm.com

Damon Xenopoulos, Esq.
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, N.W.
Suite 800 West
Washington, DC 20007
dex@smxblaw.com

James Blanding Holman, IV, Esq.
Southern Environmental Law Center
463 King Street, Suite B
Charleston, SC 29403
bholman@selcsc.org



Stephanie U. Eaton (SC Bar No. 80073)

Dated: January 25, 2018